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9
10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 FEDERAL NATIONAL MORTGAGE
13 ASSOCIATION,

14 Plaintiff,

15 v.

16 JAYEM FAMILY L.P., and SUN CITY
17 ANTHEM COMMUNITY ASSOCIATION,
18 INC.,

19 Defendants.

Case No. 2:17-cv-01800-JAD-GWF

STIPULATION AND ORDER TO
EXTEND RESPONSIVE PLEADING
DEADLINE

(First Request)

20 Plaintiff Federal National Mortgage Association (“Fannie Mae”), Defendant Jayem Family
21 L.P. (“Jayem”), and Defendant Sun City Anthem Community Association (“Sun City Anthem”)
22 (collectively hereinafter referred to as the “Parties”), by and through their respective counsel of
23 record, hereby stipulate and agree to extend the deadline for Jayem to respond to the Complaint
24 (ECF No. 1). This is the Parties’ first request.

25 1. Jayem has retained counsel in this matter after having been served through the
26 Nevada Secretary of State.

27 2. Fannie Mae and Jayem are currently in settlement discussions in an effort to resolve
28 the title dispute to the property at issue in this case, as well as several other properties where Jayem
(or its affiliates) and Fannie Mae or Freddie Mac are claiming adverse interests.

3. One of the goals of the settlement discussions is to save litigation costs in this action

as well as other lawsuits where Jayem and Fannie Mae or Freddie Mac are parties.

4. Given that the settlement discussions involve multiple or more than one property and lawsuit, and that time will be needed to gather and collect data for each property, the Parties anticipate it will take approximately 90 days to determine if a settlement can be accomplished.

5. Additionally, on October 23, 2017, the Court stayed this case in light of the NRED mediation scheduled for December 5, 2017, and provided that the Parties can lift the stay following the mediation.

6. Accordingly, the Parties agree that good cause exists to extend Jayem's responsive pleading deadline to fourteen days after the stay is lifted in this case. The Parties hereby respectfully request that the Court enter an order confirming said deadline.

IT IS SO STIPULATED AND AGREED.

Dated this 27th day of October, 2017.

WRIGHT FINLAY & ZAK

/s/ Christina V. Miller

Christina V. Miller, Esq., NV Bar No. 12448
7785 W. Sahara Avenue, Suite 200
Las Vegas, NV 89117

Dated this 27th day of October, 2017.

THE CLARKSON LAW GROUP, P.C.

/s/ Matthew McAlonis

Matthew McAlonis, Esq., NV Bar No. 11203
2300 West Sahara Avenue, Suite 950
Las Vegas, NV 89102

Dated this 27th day of October, 2017.

TAKOS LAW GROUP, LTD.

/s/ Zachary P. Takos

Zachary P. Takos, Esq., NV Bar No. 11293
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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: 10/30/2017